



## 2022 Federal Election Priorities

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### Australians who are blind or have low vision matter

There are approximately 453,000 Australians who are blind or have low vision<sup>1</sup>, and this number will continue to rise as our population ages. Vision Australia is the nation's largest blindness and low vision service provider, respected by the community as the experts in our field.

For more than 150 years, Vision Australia, and its predecessors, has delivered services for our clients so they can live the life they choose. Through our 32 centres, we support individuals at every stage of life, by providing a broad range of services, including: disability employment services, expert clinical advice, children services, Seeing Eye Dog services, and orientation and mobility training. We are also a leading provider of NDIS and My Aged Care for people who are blind or have low vision. Finally, one of our most utilised services is our library. It is the only of its type in our nation, providing people with a print disability access to more than 43,000 accessible book titles.

We are pleased to present our 2022 Federal Election Priorities, which were developed in consultation with people who are blind or have low vision, most notably voters. If you invest in issues that matter in the blind and low vision community, a significant positive impact will be felt by the blindness and low vision community and in some areas, by all people with disability.

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<sup>1</sup> ABS and SDAC

## Key Commitments

In this election Vision Australia seeks Five Key Commitments

1. Effective and relevant aged care supports and services.
2. Investment in the NDIS to meet the needs of people who are blind or low vision.
3. Commitment to equal employment opportunities.
4. Embedding inclusive education.
5. Safe electric vehicles for blind and low vision pedestrians.

## Effective and relevant aged care supports and services

### The Challenge

The majority of vision loss occurs later in life. Of the approximately 450,000 of Australians with blindness and low vision, we estimate that 70% are aged 65 years or older. This number will only increase as the population ages and lives longer. For older Australians, early interventions and supports can assist them to live independently for longer and stop them from progressing onto higher levels of care. Unfortunately, the aged care system is not currently designed to provide people who are blind or have low vision with the supports they need in a timely and affordable way. This leads to older Australians with a vision impairment being at twice the risk of falls and other complications resulting in them entering aged care facilities three years earlier than their non-sighted peers.<sup>2</sup> They are also at increased risk of social isolation and increased incidence of mental health conditions.

### The Solution

The reform of the aged care system must take account of older Australians who are blind or have low vision through the implementation of four key changes.

#### **1. Recognizing Specialized Support Service Vision as a key early component of the aged care system**

People who are blind or have low vision, and are aged care consumers, have more specific needs to the vast majority of consumers in the sector. The needs of this group are not necessarily linked to frailty, or focussed around daily living supports, but are instead or additionally to do with blindness and low vision rehabilitation. Most often, these consumers only access services periodically to assist with strategies for independence as their vision levels change.

Funding models for in-home care must be built to cater for single need services like vision services, which are highly specialized and delivered less frequently, or on an as needs basis.

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<sup>2</sup> Access Economic Pty Ltd (2010), "Clear Focus: The Economic Impact of Vision Loss in Australia in 2009

It is essential for consumers in the aged care system to be able to access single need vision services in a targeted manner. A constructive and practical way to achieve this is to make vision services available to consumers as an early intervention service. That is, as a service that can be accessed without requiring a full aged care assessment, or the implementation of a full package of supports. Access could instead be based on a streamlined assessment, proportional to the needs of the recipient. The potential to prolong independence and reduce health expenditure are important factors in providing services to older Australians as part of a scheme that builds capacity at an early stage. This scheme would be in addition to providing vision services within the system where they are otherwise required.

## **2. Criteria be developed for Specialist Support Providers**

Aged care providers do not currently have to comply with evidential requirements to demonstrate their suitability to offer specialized services. This can be particularly problematic in the provision of blindness and low vision services, where there are substantial risks if compensatory skills are not taught safely. We propose that aged care providers be required to meet set criteria before they can provide specialized services, to ensure that their workforce is properly trained and skilled in the particular specialization. Vision Australia already invests considerable time in training and professional development to supplement the qualifications of our allied health professionals for this purpose.

## **3. A National Assistive Technology scheme be developed and implemented**

One of the factors in allowing older Australians to continue living independently and safely in their own homes is the provision and use of a variety of low-cost and/or specialized Assistive Technology (AT). The introduction of AT in the early stages of vision loss is beneficial in reducing adverse outcomes for older Australians, and is a good return on investment.<sup>3</sup> Currently though, those who fall outside the NDIS are not accessing this vital equipment because of failings, inconsistencies and inefficiencies in the Commonwealth Home Support Program, the Home Care Package Program and the numerous State/Territory based AT schemes.

We urge the Government to develop and implement a nationally consistent, harmonized scheme to deliver AT to older Australians with a disability, in line with the Assistive Technology for All Campaign<sup>4</sup>. This will ensure equitable and affordable access to necessary aids and equipment. It is also in line with the recommendations of the Royal Commission into Aged Care Quality and Safety and the recognition in Australia's Disability Strategy 2021-2031 of the importance of people with disability being supported to access AT.

## **4. Eyes On-Call**

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<sup>3</sup> Australian Healthcare Associates for the Australian Government Department of Health 2020, review-of-assistance-technology-programs-in-australia-final-report\_0.pdf (health.gov.au)

<sup>4</sup> <https://assistivetechforall.org.au/>

Many older Australians who experience vision loss are not aware of the supports and training that is available to assist independent living and continued community participation. Aged care workers, and assessors are in a unique position to provide this information. However, proper education and support of the aged care workforce is necessary to achieve this. For this reason, we propose the establishment of an on-call eye health and vision coaching and support service, 'Eyes On-Call'. The service will provide staff with phone and video based information and connect them to resources and training across the eye health and vision sector. Specifically, Eyes on Call staff would advise on areas such as common eye conditions, signs and symptoms of these conditions, and how to minimize their impact. In addition, they would provide options for referral and management of aged care recipients, and offer training and resources to enhance assessment or care. We call upon the next Government to invest \$5.04 million over 4 years to trial an Eyes on Call service.

## **Investment in the NDIS**

### **The Challenge**

The intent and potential of the NDIS is to allow people with disabilities to access tailored supports and services to meet their goals, and to support their independence, and social and economic participation. However, there remains challenges for NDIS participants in being properly funded to have their individualized needs met, and for their service providers in sustainably delivering those services. Challenges also exist in the timely access to early intervention supports for visually impaired children.

### **The Solution**

Vision Australia calls upon the next Government to invest in the NDIS to meet the specialized needs of people who are blind or have low vision by committing to three essential initiatives.

#### **1. Appropriate participant funding**

The NDIS was created to be a transformative social insurance program, fully funded by Government. It is therefore critical to understand the NDIS primarily as an essential social service, rather than an economic program.<sup>5</sup> The focus of the NDIS should continue to be on the benefit to its participants, rather than on the cost of funding the Scheme. Any reduction in funding, or diminishing of services, would have a significant impact on the ability of current and future participants to meet their potential, and to engage fully in the community. We urge the Government to maintain its focus on the purpose underpinning the Scheme to ensure that the needs of people with a disability are properly supported.

#### **2. A sustainable system for service providers**

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<sup>5</sup> Analysis by Per Capita for National Disability Services for the Teamworks Works campaign, November 2021

A fundamental indicator in the success of the NDIS is whether participants can access the quality supports and services they need to meet their goals. This requires the Scheme to be sustainable for service providers in providing these supports. Vision Australia's clients have highly specialized service needs that local and generalist service providers are not equipped to meet. We face considerable challenges in working within the Scheme to provide the comprehensive, needs-based, and high-quality services that are expected and required by NDIS participants.

To ensure that the Scheme is sustainable for specialized service providers like Vision Australia, the Government must, at least, maintain therapy prices and simplify administrative processes such as invoicing. For Vision Australia, existing price caps are barely sufficient to allow for sustainable service provision. This is because of the higher costs associated with service delivery for blind and low vision participants. Some of the factors which contribute to this are: (a) the need for services to be delivered in a home or community environment; (b) the training, development and specialized expertise required of service staff; and (c) the high administrative loads and travel costs associated with remote delivery of services. Any reduction in therapy prices would likely lead to office closures in regional areas and loss of access to services for people who are blind or have low vision.

### **3. NDIS Packages for Blind and Low Vision Children**

It is imperative that children with a vision impairment receive early intervention supports to assist their functionality, prevent developmental delay and maximize educational outcomes. At present, there are challenges for some children in accessing NDIS services because of the strictness of diagnostic criteria for vision conditions, and the difficulty in accurately determining visual acuity, and developmental delay. We are aware that the NDIA has worked with the deaf community to develop a hearing pathway for hearing impaired children so that those children can access an agreed 'package' of services at an early stage. We request a collaboration with the blind and low vision community to deliver a similar arrangement for vision impaired children. It would be vital that any package of supports include occupational therapy, orientation and mobility, and assistive technology.

## **Equal Employment Opportunities**

### **The Challenge**

Meaningful employment is integral for every Australian to maximise opportunities for participation in all aspects of life including economic security, buying or renting a home, access to goods and services and social connection.

Finding and maintaining a job is the most significant challenge facing Australians who are blind or have low vision. The unemployment rate for people with disability in Australia is almost double the rate of people without disability. Those with blindness and low vision represent the highest level of unemployment across all disability groups.

Research conducted by Vision Australia with the CNIB Foundation (Canada) and the Blind Foundation of New Zealand, found that only 24% of Australians who are blind or have low vision are in full time employment. This figure was lower than both Canada and New Zealand.

## **Government Strategies and Targets**

We acknowledge the Australian Public Service Employment Disability Strategy 2020-2025 (the Disability Strategy), and the actions within that document. We also recognize the Australian Government's commitment to a new employment target for people with disability in the APS of 7% by 2025. By the Government's own statistics, though, in the last 30 years the proportion of people with disability employed in the Australian Public Service (APS) has declined: from 6.8% in 1986 to just 4% in 2020.<sup>6</sup> Further, the Government's previous Disability Employment Strategy has had little impact in increasing the number of people with disability employed in the APS: with only a 0.5% gain over a 5 year period (from 3.6% in the 2016-2017 year to 4.1% in the 2020-2021 year).<sup>7</sup>

## **The Solution**

Any possibility of the Government meeting its disability employment target will require a considerable and sustained focus. If the Government is serious about implementing the measures in the Disability Strategy, and keeping these at the forefront, Commonwealth agencies should be reporting to the APS Commission on disability employment measures and statistics monthly or bi-monthly, rather than annually. This information should also be made available to the disability community, and the general public in a timely manner. It is only with accountability and transparency in the disability employment space that there is the potential for real change.

In addition, we call on the Government to implement two employment specific initiatives.

### **1. Creating clear and enforceable ICT accessibility requirements within the Commonwealth Procurement Framework**

One of the most significant barriers that people who are blind or have low vision encounter when seeking employment is the inaccessibility of much of the ICT that is used in workplaces. Screen-reading and screen magnification software, and other adaptive technology make it possible for people who are blind or low vision to use computer applications and related technologies, but only if they have been designed to comply with accessibility guidelines. In a survey Vision Australia conducted in 2018, 43% of Australian respondents ranked lack of workplace accessibility as one of the four main barriers to gaining and maintaining employment.

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<sup>6</sup> Australian Public Service Employment Disability Strategy 2020-2025

<sup>7</sup> Australian Public Service Commission State of Service Annual Reports (2016-2017, 2017-2018, 2018-2019, 2019-2020, 2020-2021)

Australian Standard AS EN 301 549 has the potential to remove ICT accessibility barriers for the employment of people who are blind or low vision. However, it will only be effective if it is mandated as a distinct step in the Government's procurement framework and is coupled with transparent reporting mechanisms and sanctions for non-compliance. The current Commonwealth Procurement Framework is a complex framework which bundles accessibility considerations with other requirements as part of a self-assessment model. Without changing its status in the framework, the Standard fails to be a useful tool to foster and encourage the employment of people who are blind or low vision. Enhanced accessibility training across the APS is an important factor which should also underpin this change.

## **2. A Reformed Disability Employment Service**

We acknowledge the Government's commitment to the design of a new Disability Employment Support Model to replace the current Disability Employment Service. We urge the Government to design the model with the aim of creating a customized service, which emphasizes the individual, and moves away from being a short-term solution. It is vital that the new disability employment model is reformed in a way that supports a change in thinking around disability employment, and paves the way for an upward trend in employment rates, and the employment of individuals in roles that are commensurate with their skills and experience.

## **Inclusive Education**

### **The Challenge**

It is fundamental that students with a disability can access, and participate in education on the same basis as their peers, across all educational settings. Australia's Disability Strategy 2021-2031 recognizes that strengthening education systems to support students with a disability is essential for improving all students' educational outcomes. It also identifies that access to formal and informal education is critical to the development of skills, independence and wellbeing of people with disability. Despite this, students who are blind or low vision still face significant barriers to equal education. For these students, access and inclusion in education settings (including online settings) can often be overlooked, with most facilities primarily geared towards those who are sighted. The detrimental impact of this on the future employment opportunities available to these students, and their financial independence into adulthood, cannot be overstated.

### **The Solution**

To ensure further steps towards an inclusive education for students who are blind or low vision, the next Government can implement the following initiatives.

#### **1. Implementing the Expanded Core Curriculum at a national level**

In addition to the general core curriculum, children who are blind or have low vision must have access in their learning to the disability-specific skills known collectively as

The Expanded Core Curriculum (ECC). The ECC addresses the specialized needs associated with a vision impairment to enable students to fully access and engage with the school curriculum. The ECC provides targeted education by qualified specialist teachers in the areas of assistive technology, independent living skills, and career counselling, amongst others. The skills taught as part of the ECC afford blind or low vision children the opportunity to strive for, and attain the same educational benchmarks as their peers. Research also indicates that students who have been taught these skills have better outcomes later in life.

The ECC is not currently used in all Australian jurisdictions, despite its proven benefits. Implementing the ECC nationally will ensure children who are blind or have low vision receive an education equivalent to their peers. The ECC should be implemented in conjunction with national benchmarks to monitor its delivery.

## **2. Setting requirements for all publicly funded universities to comply with ICT procurement standards**

The value of a tertiary education is increasing, and there is a clear connection between tertiary education and employment. People who are blind or have low vision and have obtained a tertiary qualification have a much greater chance of finding employment than those who have not.

Unfortunately, universities do not always take account of the accessibility needs of vision impaired students when purchasing information and communications technology. A 2018 Vision Australia Report<sup>8</sup> found that university students who are blind or have low vision experience numerous accessibility barriers when using online learning environments. With few exceptions, participants reported that they had encountered significant issues, which in some cases, had resulted in them abandoning their studies altogether. This included the inaccessibility of key components of online learning environments, such as discussion boards and collaborative tools.

Vision Australia calls upon the Government to mandate that all publicly funded universities comply with accessible ICT procurement standards. This would go some way towards achieving equitable learning outcomes in online tertiary settings.

## **Safe Electric Vehicles**

### **The Challenge**

The silent nature of electric and hybrid vehicles has caused significant safety issues for pedestrians who are blind or have low vision. These pedestrians rely on engine noise as a vital cue in navigating roads safely. 35 percent of blind and low vision pedestrians have already experienced a collision or near collision with an electric or hybrid vehicle. This is of particular concern considering that electric vehicles currently comprise only 0.2 percent of the vehicle fleet in Australia, and their numbers are

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<sup>8</sup> 'Barriers to Online Learning Experienced by University Students who are Blind or have Low Vision'



predicted to increase to 90 percent by 2050. Electric and hybrid vehicles can be made safer for all pedestrians by being fitted with Acoustic Vehicle Alerting Systems (AVAs) so that a noise is emitted by those vehicles when travelling at lower speeds.

## **The Solution**

Vision Australia has been advocating to the Government since October 2018 for AVAs to be mandated through the Australian Design Rules. This would bring the requirements in Australia in line with those that already apply in the United States and the European Union. In August 2019 Vision Australia welcomed the Government's announcement that plans were underway to progress this important issue. Despite further submissions to Government in the intervening period, the mandating of minimum noise requirements for electric and hybrid vehicles has not advanced any further. Vision Australia urges the next Government to take immediate action to protect the safety of blind and low vision pedestrians by following through on the requirement for the fitting of AVAs in electric and hybrid vehicles.